

**REMARKS**

Reconsideration and allowance of the present application are respectfully requested. Claims 1-2, 4-15, 17-19, 30-34, 37 and 38 are currently pending in this application.

*Regarding the 35 U.S.C. § 102 Rejection*

Claims 1, 2, 4-15, 17-19, and 30-34 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application No. 2004/0039993 to Kougiouris et al. (referred to below as Kougiouris for brevity). Applicant respectfully traverses this rejection for the following reasons.

Kougiouris discloses a system and method for automatically performing validation procedures and/or formatting procedures for a graphical user interface (GUI) described in a markup language file (see paragraph No. 10). The validation/formatting procedures may be managed by an executable component referred to as a "validation/formatting manager component" (see paragraph No. 13). The validation/formatting manager component is operable to perform validation/formatting for GUI elements based on custom markup language attributes (see paragraph No. 14).

Kougiouris does not anticipate any of the claims. To begin with, consider independent claim 1, as reproduced below in its entirety (with emphasis):

1. A method comprising:  
accessing a computer program;  
automatically identifying a set of one or more attributes of the computer program  
with values that are to be input to the computer program by a user; and

1                    *creating code for one or more forms* including selected ones of the set of one or  
2                    more attributes.

3  
4                    Kougiouris does not disclose the above-identified method at least because  
5                    Kougiouris does not disclose “automatically identifying a set of one or more attributes of  
6                    a computer program with values that are to be input to the computer program by a user,”  
7                    and “creating code for one or more forms including selected ones of the set of one or  
8                    more attributes” (in the context of the claim when read as a whole). More specifically,  
9                    Kougiouris discloses displaying a user interface presentation and interacting with the user  
10                    via this presentation. But merely displaying a presentation in the course of the execution  
11                    of a computer program cannot be interpreted as “creating code for one or more forms” as  
12                    recited in claim 1. The act of displaying a presentation does not *create the code* for a  
13                    presentation, but, at best, executes existing code that describes the presentation.

14                    In addressing this claim, the Office Action states, in part:

15  
16                    Applicant argues the act of displaying a form does not create the code for a form. Examiner  
17                    disagrees because the form is displayed using code. [Page 9, lines 2-4 of the outstanding  
18                    Office Action.]

19  
20                    This statement misses the point of the above argument. Suppose that a form  
21                    exists that has code lines generically represented by X, Y, and Z. When this form is  
22                    displayed, a processor will interpret this code, which may involve instantiating the form  
23                    from the code. But this act of displaying does not, properly speaking, *create the code*  
24                    comprising lines X, Y, and Z, because, in fact, these lines already exist (and thus there is  
25                    nothing to create). In the context of the present rejection, Kougiouris’s presentation are

1 indisputably displayed *using* code. But Kougiouris assumes that these presentations  
2 already exist, and hence does not discuss the process by which they are created. Hence,  
3 Kougiouris does not disclose the specific subject matter of claim 1, which, in part, recites  
4 a method for *creating* the code for one or more forms, involving an “automatically  
5 identifying operation.” Summarized more succinctly, Kougiouris uses presentations that  
6 already exist, while claim 1 is directed to a method for creating forms for subsequent use  
7 when invoked.

8 For at least the above-stated reason, Kougiouris does not disclose the subject  
9 matter of claim 1.

10 Consider next independent claim 11, as reproduced below in its entirety (with  
11 emphasis):

12  
13 11. A method comprising:

14 accessing a computer program, wherein the computer program includes a plurality  
15 of interactions that each include one or more command definitions and one or more view  
16 definitions, wherein each command definition defines a command having various attributes  
17 and a behavior, and wherein each view definition defines a view that is a response to a  
18 request; and

19 automatically identifying a set of one or more attributes of the computer program  
20 with values that are to be input to the computer program by a user wherein the automatically  
21 identifying comprises,

22 identifying, for each of the command definitions of each of the plurality of  
23 interactions, the methods of the command definition,

24 *checking, for each identified method that sets a value, whether a corresponding*  
25 *identified method obtains the value, and*

1 identifying, as an attribute of the set of one or more attributes, each attribute  
2 corresponding to a method that sets a value for the attribute for which there is no  
3 corresponding identified method that obtains the value for the attribute; and  
4 outputting an identification of the set of one or more attributes.  
5

6 Kougiouris does not disclose the above-identified method at least because  
7 Kougiouris does not disclose “checking, for each identified method that sets a value,  
8 whether a corresponding identified method obtains the value” (in the context of the claim  
9 when read as a whole).

10 As previously discussed, Kougiouris does perform a validation operation.  
11 However, validation traditionally provides a mechanism for comparing user input against  
12 predetermined expectations regarding proper (i.e., valid) input. This does not pertain to  
13 what is being recited in claim 1, namely, “checking, for each identified method that sets a  
14 value, whether a corresponding identified method obtains the value.” In other words, the  
15 checking of claim 11 concerns a specific correspondence among methods of a computer  
16 program, *not* a comparison between text received by a user and predetermined  
17 expectations regarding the proper form of this text.  
18

19 In addressing claim 11, the Office Action states, in part:  
20

21 Applicant argues Kougiouris’ validation operation does not pertain to the method that sets a  
22 value, determines whether a corresponding method obtains a value. Examiner disagrees  
23 because Kougiouris’ validation operations is [sic] determining if there was a previously set  
24 value. [Page 9, last sentence to page 10, first sentence.]  
25

1 This statement does not accurately quote the language of claim 11, which again  
2 provides “checking, for each identified method that sets a value, whether a corresponding  
3 identified method obtains the value.” To repeat, what is being checked are certain  
4 methods in a computer program vis-à-vis certain other methods in a computer program.  
5 This has nothing to do with comparing a user’s input text against pre-established  
6 validation rules.

7 For at least the above-stated reason, Kougiouris does not disclose the subject  
8 matter of claim 11.

9 Consider next independent claim 14, as reproduced below in its entirety (with  
10 emphasis):

11  
12 14. A method comprising:

13 accessing a computer program;

14 automatically identifying a set of one or more outputs of the computer program;

15 generating a list identifying the set of one or more outputs; and

16 outputting the list,

17 *wherein the identifying and generating are performed based on an analysis of*  
18 *computer program code, independent of execution of the computer program to provide one*  
19 *or more views.*

20  
21 Kougiouris does not disclose the method of claim 14 at least because Kougiouris  
22 does not disclose the above-identified accessing, identifying, generating, and outputting  
23 operations, “wherein the identifying and generating are performed based on an analysis  
24 of computer program code, independent of execution of the computer program to provide  
25 one or more views” (in the context of the claim when read as a whole).

1 In addressing claim 14, the Office Action states, in part:

2  
3 With respect to claim 14, Applicant argues there is no generation of a list  
4 identifying a set of one or more outputs and outputting the list. Examiner respectfully  
5 disagrees. Kougiouris discloses outputting the attributes in a form such as an HTML form in  
6 which the various attributes are listed. See figures 5A-5C. Outputting the attributes in a  
7 form is 'outputting the list of outputs'. The said identifying one or more outputs of a  
8 computer program is **an analysis of the computer code**. [See page 10, first full paragraph,  
9 emphasis in the original.]  
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11 This statement does not accurately quote the terminal wherein clause of claim 14,  
12 which again reads, "wherein the identifying and generating are performed based on an  
13 analysis of computer program code, *independent of execution of the computer program*  
14 *to provide one or more views*." While Kougiouris indisputably displays presentations,  
15 the Kougiouris invention displays these presentations in the normal course of executing  
16 the computer program and interacting with a user via the presentations. In contrast, the  
17 generating operation claim 14 is stated to be "independent of execution of the computer  
18 program to provide one or more views," thus indicating that claim 14 cannot be  
19 interpreted as the mere display of a form.

20 For at least the above-stated reason, Kougiouris does not disclose the subject  
21 matter of claim 14.

22 The final independent claim, i.e., claim 30, recites features that are related to the  
23 subject matter of claim 1. Accordingly, Kougiouris fails to disclose the subject matter of  
24 claim 30 for reasons that are similar to those presented above with respect to claim 1.  
25

1       The remaining rejected claims depend variously from the above-identified  
2 independent claims. These claims are allowable for at least this reason. In addition,  
3 these claims recite additional subject matter which is not disclosed in or suggested by  
4 Kougiouris.

5       As stated in MPEP § 2131, "A claim is anticipated only if each and every element  
6 as set forth in the claim is found, either expressly or inherently described, in a single prior  
7 art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053  
8 (Fed. Cir. 1987). As noted above, Kougiouris fails to disclose all of the elements in the  
9 independent claims. Accordingly, Kougiouris fails to anticipate any of the claims under  
10 35 U.S.C. § 102.

11       For at least the above-identified reasons, the Applicant submits that the 35 U.S.C.  
12 § 102(e) rejection is misplaced, and therefore respectfully requests that it be withdrawn.

13  
14       *New Claims*

15       This Response adds two new claims, i.e., claims 37 and 38. These claims depend  
16 on claims 1 and 30, respectively, and are allowable for at least this reason. In addition,  
17 these claims recite additional subject matter which further distinguishes these claims over  
18 the Kougiouris patent. Acknowledgement of the allowability of claims 37 and 38 is  
19 respectfully requested.  
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## Conclusion

The arguments presented above are not exhaustive; Applicant reserves the right to present additional arguments to fortify its position. Further, Applicant reserves the right to challenge the alleged prior art status of one or more documents cited in the Office Action.

In conclusion, all objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance and such allowance is respectfully solicited. The Examiner is urged to contact the undersigned if any issues remain unresolved by this Amendment.

Respectfully Submitted,

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